

**WEST PALM BEACH OFFICE:**  
2139 PALM BEACH LAKES BLVD.  
WEST PALM BEACH, FLORIDA 33409  
P.O. BOX 3826  
WEST PALM BEACH, FLORIDA 33402

SEARCY  
DENNEY  
SCAROLA  
BARNHART  
& SHIPLEY P.A.

*Attorneys  
at Law*

**TALLAHASSEE OFFICE:**  
THE TOWLE HOUSE  
517 NORTH CALHOUN STREET  
TALLAHASSEE, FL 32301-1231

**VIA EMAIL and U.S. MAIL**

June 19, 2014

Tonja Haddad Coleman, Esquire  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301

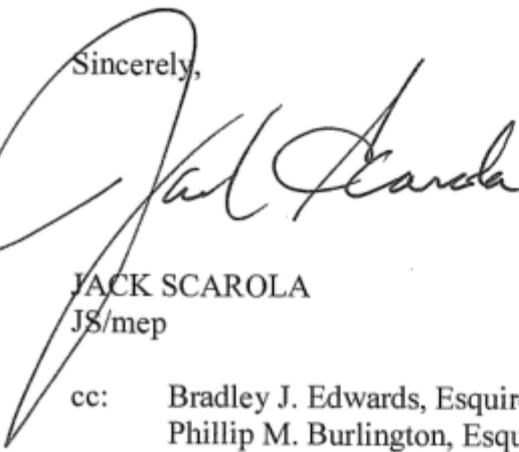
Re: EDWARDS ADV. EPSTEIN  
Case No. 502009CA040800XXXXMB  
Our File No.: [REDACTED]

Dear Ms. Coleman:

The Motion for Fees and Costs which you have noticed on the Uniform Motion Calendar for June 30th cannot be heard in the limited time available on that calendar both because the legal issues presented will require more than 10 minutes to argue and because the viability of the "Offer of Judgment" presents factual issues that require an evidentiary hearing.

In addition, the pending appeal on the underlying summary judgment should be resolved before this motion is heard as the appeal is likely to render the motion moot.

Sincerely,

  
JACK SCAROLA  
JS/mep

cc: Bradley J. Edwards, Esquire  
Phillip M. Burlington, Esquire

ATTORNEYS AT LAW:  
ROSALYN SIA BAKER-BARNES  
\*F. GREGORY BARNHART  
T. HARDEE BASS, III  
LAURIE J. BRIGGS  
\*BRIAN R. DENNEY  
BRENDA S. FULMER  
MARIANO GARCIA  
JAMES W. GUSTAFSON, JR.  
MARA R. P. HATFIELD  
ADAM S. HECHT  
JACK P. HILL  
KELLY HYMAN  
DAVID K. KELLEY, JR.  
CAMERON M. KENNEDY  
WILLIAM B. KING<sup>7</sup>  
DARRYL L. LEWIS<sup>1</sup>  
\*WILLIAM A. NORTON  
PATRICK E. QUINLAN<sup>3</sup>  
EDWARD V. RICCI  
\*JOHN SCAROLA  
MATTHEW K. SCHWENCKE  
\*CHRISTIAN D. SEARCY  
\*JOHN A. SHIPLEY III  
CHRISTOPHER K. SPEED<sup>246</sup>  
BRIAN P. SULLIVAN<sup>246</sup>  
KAREN E. TERRY  
DONALD J. WARD III<sup>9</sup>  
\*C. CALVIN WARRINER III

OF COUNSEL  
\*EARL L. DENNEY, JR.<sup>5</sup>

SHAREHOLDERS  
\*BOARD CERTIFIED

ALSO ADMITTED  
<sup>1</sup> KENTUCKY  
<sup>2</sup> MAINE  
<sup>3</sup> MARYLAND  
<sup>4</sup> MASSACHUSETTS  
<sup>5</sup> MISSISSIPPI  
<sup>6</sup> NEW HAMPSHIRE  
<sup>7</sup> NEW JERSEY  
<sup>8</sup> VIRGINIA  
<sup>9</sup> WASHINGTON DC

PARALEGALS:

VIVIAN RYAN-TEJEDA  
RANDY M. DUFRESNE  
DAVID W. GILMIRE  
JOHN C. HOPKINS  
DEBORAH M. KNAPP  
VINCENT L. LEONARD, III  
JAMES PETER LOVE  
ROBERT W. PITCHER  
PABLO PERHACS  
KATHLEEN SIMON  
STEVE M. SMITH  
BONNIE S. STARK  
WALTER A. STEIN

